IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION

In re:	)	Case No. 5:18-01919 (RNO)
	)	
DENNIS EDWARD FITZMAURICE	)	Chapter 13
	)	
TERRY LYNN FITZMAURICE	)	
	)	
	)	**OBJECTION TO CONFIRMATION**
	)	
	)	
	)	

AmeriCredit Financial Services, Inc. dba GM Financial ("GM Financial"), a secured

creditor of the Debtors, objects to the Debtors' plan for the following reasons:

A. The Debtors' proposed plan fails to pay interest on GM Financial's claim for the

2014 Ford Escape. GM Financial is entitled to be paid the prime rate of interest plus

an increase for risk of loss. In Re Till. The prime interest rate at the time of the

Debtors' filing was 4.75%. GM Financial objects to the debtor's plan unless the

Debtors pay an interest rate of 6.75% on the net loan balance of $13,575.57 over the

life of the plan (60 months) in order to adequately protect GM Financial for any risk

of loss.

B. The plan as proposed also violates §1326(a)(1) since it does not provide for payment

to GM Financial of adequate protection payments. Adequate protection payments

should be made to GM Financial beginning in June of 2018 at $135.00 per month,

being 1.0% of the net loan balance. Payments should be made within thirty (30) days

of filing and should continue up to and after confirmation, until regular payments are

to be commenced through the plan to GM Financial. Adequate protection payments to GM Financial should be given super priority administrative expense status and in all events must be paid prior to payment of any counsel fees to Debtors' attorney.

C. GM Financial must retain its lien on the vehicle until such time that the Debtors complete their chapter 13 plan *and* receive a discharge.

/s/ William E. Craig
William E Craig, attorney for
AmeriCredit Financial Services, Inc.
dba GM Financial

Dated: 6/1/18